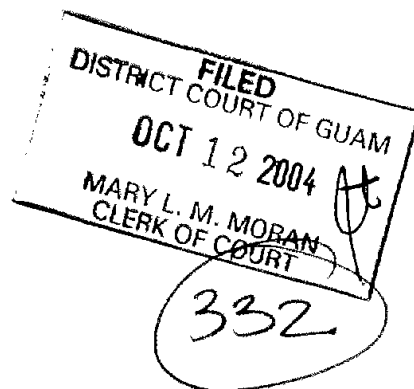


**JACQUES G. BRONZE, ESQ.**

**LAW OFFICES OF BRONZE & TANG**

A Professional Corporation  
BankPacific Building, 2<sup>nd</sup> Floor  
825 South Marine Corp Drive  
Tamuning, Guam 96913  
Telephone: (671) 646-2001  
Facsimile: (671) 647-7671



**RICHARD A. PIPES, ESQ.**

**LAW OFFICES OF RICHARD A. PIPES**

A Professional Corporation  
BankPacific Building, 2<sup>nd</sup> Floor  
825 South Marine Corp Drive  
Tamuning, Guam 96913  
Telephone: (671) 646-2001

*Attorneys for Defendant Hongkong and Shanghai Banking Corporation, Ltd.*

DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU  
SADHWANI, and K. SADHWANI'S  
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI  
BANKING CORPORATION, LTD.,  
et al.,

Defendants.

CIVIL CASE NO. 03-00036

DECLARATION OF JACQUES G.  
BRONZE IN SUPPORT OF  
HSBC's OBJECTIONS TO  
MAGISTRATE JUDGE'S ORDER  
DENYING MOTION FOR  
PROTECTIVE ORDER; REQUEST  
FOR ORAL ARGUMENT

**I, JACQUES G. BRONZE,** hereby declare and state as follows:

1. All matters herein are based on my own personal knowledge.
2. I am over 18 years of age, and legally competent to testify to the facts below and I do so based upon my own personal knowledge.

3. I am the co-counsel of record for Hongkong and Shanghai Banking Corporation, Ltd., ("HSBC"), in the above-entitled matter.

4. On October 8, 2004, HSBC filed its *Ex Parte* Motion for Protective Order under FRCP 26(c).

5. The Magistrate Court orally denied the motion and also declined to stay the order.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

**EXECUTED** on this 12<sup>th</sup> day of October 2004.



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**JACQUES G. BRONZE**